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June 20, 2023

Via ECF

Hon. Nelson S. Román United States District 633 Third Ave. Floor 37 New York, New York 10017 Counsel is directed to the Court's Individual Rule 3(A)(ii): "If a pre-motion conference is requested in connection with a proposed motion to dismiss, the request will stay the deadline for the requesting party to move or answer, and a new deadline will be set at the conference."

Dated: June 22, 2023

White Plains, NY

Re: Palisades Estate EOM, LLC et a. v. County Rockland, New York et al.,

Index No. 7:23-cv-04215 (NSR)

Dear Judge Román:

This office is legal counsel to Defendant St. Lawrence County. We write in response to Plaintiffs' counsel's request for an extension of time to respond to pre-motion letters requesting a conference filed by several Defendants, including St. Lawrence County.

The Court has directed Plaintiffs to respond to the pre-motion letter by June 22, 2023. ECF No. 171. The Court also directed St. Lawrence County to file an Answer by July 17, 2023 by Text Entry Order dated June 16, 2023. St. Lawrence County does not object to the Plaintiffs' request to for additional time to respond to the pre-motion letter in principle; however, we request that the Court likewise extend St. Lawrence County's time to file a motion to dismiss until at least 30 days after the Court conducts the pre-motion conference.

We appreciate the Court's attention to this matter.

Respectfully submitted,

HANCOCK ESTABROOK, LLP

James P Vannos

JPY

CC: All counsel of record (Via ECF)